

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD OF PUERTO  
RICO

as representative of

THE COMMONWEALTH OF PUERTO  
RICO, et al.

Debtors

PROMESA (TITLE III)

CASE NO.: 17-03283-LTS

Chapter: 9

**JOINT MOTION FOR WITHDRAWAL  
AND SUBSTITUTION OF LEGAL COUNSEL**

TO THE HONORABLE COURT:

Comes now, Caribbean Hospital Corporation (hereafter "CHC"), creditor and/or party-in-interest as to the Commonwealth of Puerto Rico hereto (Case No. 17 BK 3283-LTS) (Proof of Claim no. 54), and respectfully states and moves, as follows:

1. Creditor CHC filled its proof of claim against debtor, The Commonwealth of Puerto Rico, on July 31, 2017, through the legal representation of undersigned attorney, Freddie Pérez González.
2. CHC has agreed with the undersigned, Freddie Pérez González, to the withdrawal of his legal representation in this matter and that effective this date he be substituted by undersigned attorney, Pedro Nicot Santana, as attorney of record for CHS in this case.
3. The undersigned also move for the court to order the Clerk of the Court to cease

all notifications to the undersigned's address and continue its notifications to  
CHC and through its counsel Pedro Nicot Santana, to the following addresses :

Pedro Nicot Santana, Esq.  
P. O. Box 360486  
San Juan, P.R. 00936-0486  
pedronicot@gmail.com

Caribbean Hospital Corporation  
P. O. Box 11691  
San Juan, P.R. 00922  
c/o Dr. Sylvia Lourdes de la Peña  
Secretary

WHEREFORE, it is respectfully requested that this Honorable Court:

- A) Accept the withdrawal of Freddie Perez Gonzalez as attorney of record for CHC  
in this case; and,
- B) Take notice that the legal representation of CHC will be provided from now on by  
Pedro Nicot Santana, Esq.; and,
- C) Cease all notifications to the undersigned and continue notifying CHC and  
Counsel Pedro Nicot Santana to the above stated addresses.

RESPECTFULLY SUBMITTED.

I hereby certify that on this date, I electronically filed the foregoing with the Clerk  
of the Court using the CM/ECF system which will send notification of such filing to all  
participants.

In San Juan, Puerto Rico, this 13<sup>th</sup> day of February, 2019.

s/Freddie Pérez González  
USDC-PR119005

s/Pedro Nicot Santana, Esq.  
USDC-PR 126601

**FREDDIE PEREZ GONZALEZ &  
ASSOC., P.S.C.**

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